

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

March 29, 2022

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASUnited States of America
v.BY: AD
DEPUTY

Case No.

1:22-mj-323-DH

Shannon Wilson*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 17, 2022 in the county of Travis in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 922(g)(1)

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

- ☐ Sworn to before me and signed in my presence.
☒ Sworn to telephonically and signed electronically.

Date: 03/29/2022City and state: Austin, Texas*Complainant's signature*Special Agent Brandy Horton, FBI*Printed name and title**Judge's signature*Dustin Howell, U.S. Magistrate Judge*Printed name and title*

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff.

v.

SHANNON WILSON,

Defendant.

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Criminal No. 1:22-mj-323-DH

Affidavit in Support of Criminal Complaint

I, Brandy Horton, being duly sworn, depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), and have been so employed since August 2020. I am currently assigned to the San Antonio Field Office, Austin Resident Agency, Austin, Texas. I am currently assigned to a violent crime squad where my responsibilities include enforcing federal criminal statutes, including investigations involving bank robbery, Hobbs Act robberies, violent gangs and groups, fugitives, and firearms violations.

2. Based on the facts set forth in this affidavit, there is probable cause to believe that a violation of Title 18, United States Code § 922(g)(1) (Felon in Possession of a Firearm) has been committed by Shannon Jycquis WILSON.

3. This affidavit is based on my personal knowledge as well as investigative activities by other FBI agents and law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of the complaint, it does not contain every fact known to me or other agents of the FBI.

Probable Cause

4. In or about March 2022, your affiant met with members of FBI's Austin Safe Streets Task force regarding violent offenders operating in the Austin area as part of a Violent

Crimes Intervention Program. The program was designed for multiple investigative units to work in concert to identify, disrupt, and suppress the violent acts of the subjects identified. These individuals are identified gang members who are involved in violent crime associated with the use of firearms. One such individual, Shannon Jycquis WILSON, was identified as a suspect in at least three firearms-related aggravated assault cases in Austin, Texas during August and September 2021. At that time, WILSON was on federal supervised release following a conviction in 2019 for a violation of Title 18, United States Code § 922(g)(1) (Felon in Possession of a Firearm). WILSON's supervised release was revoked on January 3, 2022, and he was sentenced to six months of custody with no supervision to follow.

5. In or about September 2021, surveillance was conducted of WILSON leaving an appointment with United States Probation, during an attempted traffic stop by APD for an observed traffic violation, WILSON evaded in a vehicle. The pursuit was terminated, however, members of APD maintained surveillance on the vehicle. WILSON drove the car to the parking lot of an apartment complex in Austin. WILSON fled the vehicle on foot and was lost by the surveillance team. A short time later, an unknown male was observed walking to the vehicle that was driven by WILSON. The individual was observed retrieving a black, semi-automatic pistol from the driver's side interior of the vehicle and walking away.

6. In or about September 2021, APD obtained an arrest warrant for WILSON for evading during the attempted traffic stop. WILSON was subsequently arrested and his federal supervised release status was revoked as described above. WILSON completed his federal sentence in or about February 2022.

7. On or about March 17, 2022, members of APD, Major Crimes Suppression Unit, Gang Suppression Unit, and the FBI conducted a joint operation to locate, identify, and disrupt

violent criminal activity and illegal narcotics sales in the Austin area. According to APD, there has been a recent spike in overdoses where Fentanyl was found to have been mixed into illegal drugs and sold in and around Austin, Texas.

8. At approximately 7:00 pm, an APD detective observed Shannon WILSON at a gas station near the intersection of Martin Luther King Jr Boulevard and Springdale Road in Austin, Texas. WILSON was positively identified as the driver of a tan 2004 Mercedes Benz displaying Texas temporary permit 825851F.

9. APD officers conducted a driver's license query and discovered WILSON did not have a valid driver's license. WILSON was observed re-entering the driver's seat of the Mercedes, exiting the gas station parking lot, and driving westbound on Martin Luther King Jr Boulevard.

10. Uniformed officers who knew WILSON did not have a valid driver's license conducted a traffic stop in the 2900 block of East Martin Luther King Jr Boulevard. Officers made contact with WILSON and a female front passenger who was fully identified and is referred to in this affidavit as SUBJECT-1. APD Officers detected an odor of marijuana emitting from the Mercedes. SUBJECT-1 self-admitted to having marijuana inside her purse located inside the Mercedes.

11. During a probable cause search of the vehicle, APD officers located a small bag containing a green leafy substance inside SUBJECT-1's purse. The substance was identified through the officer's training and experience to be marijuana. Also found inside the purse was a black and gray pistol. Upon further examination, APD officers determined the pistol to be loaded with a magazine containing 9mm ammunition and a 9mm round of ammunition in the chamber of the firearm. The firearm is described as follows: a black and gray SCCY Industries,

model CPX-2 pistol, 9mm, with serial number 742056. ATF Special Agent Dan Mueller confirmed that this firearm travelled in and affected interstate and/or foreign commerce.

12. APD officers also located a black Nike shoulder bag directly behind the center console resting on miscellaneous clothing. A search of the bag revealed three bags of pills. One bag contained orange-colored pills with an approximate weight of over 300 grams. The other two bags contained multi-colored pills with a total approximate weight of over 200 grams. Both types of pills returned a presumptive positive field test for Fentanyl.

13. APD also located and seized two cellular telephones during the traffic stop. One phone was identified as belonging to SUBJECT-1 based on SUBJECT-1's Texas driver's license and debit card being inside of the cellular telephone's case. The other phone seized from the vehicle was synced to the vehicle's audio system and is described as a black Apple iPhone in a black OtterBox case (the Device). Based on my training and experience, I know that drug dealers, like most people, carry at least one cellular telephone on or near their person at most times. Because the other phone was identified as belonging to SUBJECT-1, I believe the Device likely belongs to WILSON.

14. Based on the firearm and large amount of narcotics found inside the vehicle, both WILSON and SUBJECT-1 were arrested and transported to APD's Organized Crime Office for further questioning.

15. Prior to questioning, SUBJECT-1 was read her Miranda warning and agreed to speak about the incident. During the interview, SUBJECT-1 advised that upon the purchase of the aforementioned Mercedes, she registered the vehicle in her name but stated WILSON maintained control of the vehicle and was the primary driver. SUBJECT-1 was adamant she had no knowledge of the firearm that was located in her purse. SUBJECT-1 also stated she had no

knowledge of the pills located in the black Nike bag inside of the vehicle. SUBJECT-1 stated she and WILSON were on their way to downtown Austin prior to being stopped by the police.

16. WILSON was also arrested and transported to APD's Organized Crime Office for further interview. After being read his Miranda warning, WILSON agreed to speak to officers. WILSON denied any knowledge of the narcotics or firearm found inside the vehicle.

17. Your Affiant knows through training and experience narcotics dealers will typically carry firearms on their person to protect themselves from others. WILSON is known by APD to deal narcotics in the Austin area, more specifically the downtown area of Austin's entertainment district. WILSON is also the suspect of multiple Aggravated Assaults involving a firearm in Austin. Based on the amount of narcotics located inside the vehicle, and WILSON's criminal history, your Affiant believes WILSON was attempting to sell narcotics. Your Affiant knows through training and experience that individuals such as SUBJECT-1 will often attempt to conceal contraband on their person or property to prevent another from being charged with a crime. Affiant believes WILSON placed the firearm in SUBJECT-1's purse in order to avoid being charged with being a Felon in Possession.

18. On or about March 24, 2022, Affiant was contacted by Austin Police Department Detective Rheannon Cunningham regarding a video jail call between WILSON and a known individual (referred to in this affidavit as SUBJECT-2) that occurred on or about March 17, 2022 (the date of WILSON's arrest). The video chat depicted WILSON at a location that appeared to be Givens Park in Austin, Texas. The video showed WILSON getting in and out of a tan Mercedes. On the video, WILSON showed SUBJECT-2 other individuals hanging out at the park. During the video call, WILSON displayed a black bag filled with pills in various colors, along with a firearm that was black and gray in color. During WILSON's APD arrest later that


day, items apparently identical in appearance were located and seized from the tan Mercedes that WILSON was driving.

19. WILSON has been convicted on three separate occasions for felony Possession of a Controlled Substance in Travis County, Texas (March 2013, September 2013, and March 2015). Wilson was also convicted federally in 2018 for Felon in Possession of a Firearm and sentenced to 46 months of imprisonment. Therefore, it is illegal for WILSON to possess a firearm.

Conclusion

20. Based on the foregoing, there is probable cause to believe that the Defendant Shannon WILSON committed the offense(s) set forth in the attached Criminal Complaint.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



BRANDY HORTON
Special Agent
Federal Bureau of Investigation
Austin, Texas

Sworn to me by telephone under Rule 4.1 of the Federal Rules of Criminal Procedure on this 29th day of March, 2022.



DUSTIN HOWELL
UNITED STATES MAGISTRATE JUDGE